

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 97-190-5(SEC)

LUIS M. PENA-LORA, et al.

Defendants.

RECEIVED AND FILED  
2005 AUG 15 PM 2:46  
CLERK OF COURT  
U.S. DISTRICT COURT  
SAN JUAN, P.R.

MOTION TO APPOINT COUNSEL

COMES NOW the Defendant herein, Luis M. Pena-Loran and moves the Court to appoint counsel to represent him in the above matter, and in support thereof, would show the Court as follows:

1. That the said Defendant is currently incarcerated at the Federal Medical Center located at Fort Worth, Texas.

2. That the Defendant is very limited in his abilities to write and speak the English language, and has to depend on fellow inmates to aid and assist him in the monitoring of his legal matters.

3. That he has been made aware, by and through his conversations with other inmates, that recent decisions of the United States Supreme Court may be of extreme value to him in seeking relief from his incarceration in the captioned case.

4. That an essential element of proceeding with post-conviction remedies is the locating of his court documents for review by trained persons, who are capable of pursuing his remedies herein.

5. That the said Defendant has tried on many occasions, to contact his appointed counsel in this matter.

6. That the Defendant herein has attached hereto as exhibits, copies of the various requests to his attorney, all of which have been totally ignored.

7. That the Defendant has no funds with which to hire private counsel to pursue this matter for him, and does not have any outside contacts who can pursue the avenues necessary to obtain his needed documents.

8. That the only remaining remedy available to the Defendant is to seek the appointment of competent counsel to aid and assist him in the gathering of his necessary documents, and for their aid and assistance in evaluating his legal claims in this matter.

9. That the Defendant would assure the Court that his interests in pursuing his remedies herein are not frivolous, but are made with the best of serious intentions, and for the purpose of obtaining justice in this matter.

WHEREFORE, having fully prayed, the Defendant respectfully prays the Court to grant the relief as requested herein, to appoint counsel for the purpose of aiding and assisting him in pursuing his post-conviction remedies herein, and for all other proper relief.

Respectfully submitted,



Luis Manuel Pena-Lora  
Federal Medical Center  
Reg. No. 16057-069  
P.O.Box 15330 Dallas Unit  
Fort Worth, TX

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the above and foregoing Motion was mailed to all parties of interest herein by prepaid, first-class postage on this 7 day of August, 2005.

  
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Luis Manuel Pena-Lora